

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

JESSICA HODGES, As natural guardian of)
minor children, L.C. and D.C.; and)
ESTATE OF LEE MICHAEL CREELY,)
By and through Warren Ratchford, its)
Administrator;)

Plaintiffs,)

vs.)

Case Number: 4:22-CV-00067-WTM-CLR

CHATHAM COUNTY, GEORGIA;)
CORRECTHEALTH CHATHAM LLC;)
CORRECTHEALTH, LLC;)
CARLO MUSSO, M.D.;)
KAREN FORCHETTE; ALFRED)
NEVELS; SELENA CARDONA;)
TEANNA FRANCES-HENDERSON;)
TERENCE JACKSON; DON WHITE;)
KARLOS MANNING;)
YVETTE BETHEL-QUINNEY;)
LOWRETTA FLORENCE; AMBER)
ANDERSON; JACKIE HARNED; SUSAN)
RIVERA; and LOUIKISHA ROBERTS;)

Defendants.)

EXHIBIT 2

David Utter

From: Kim Griffin
Sent: Thursday, April 28, 2022 9:27 AM
To: CARLTON E. JOYCE; David Utter; Lighthiser, Mary Ellen; Andre Pretorius; Jonathan Hart; Will Claiborne; Lucas D. Bradley; jchristy@swfllp.com; Flint, Michael; Will Claiborne
Cc: Donna Myers; Sherri Oliver
Subject: RE: Hodges v. Chatham County- Plaintiffs' Initial Disclosures
Attachments: 20220428-Creely-Plaintiffs Initial Disclosures_Final.pdf

Good morning everyone. Please see attached Plaintiffs' Initial Disclosures and a dropbox link containing the documents referenced in our Initial Disclosures. Please let me know if you are unable to access the link and/or the documents in the link.

<https://www.dropbox.com/sh/p4g0cr87act13yn/AACYukubKXVDKxKLp3RZHzeUa?dl=0>

Have a great day.

Very truly yours,

Kimberly A. Griffin
Paralegal to William R. Claiborne
David Utter, and Casey Redwine

The Claiborne Firm, P.C.
Fair Fight Initiative
410 East Bay Street
Savannah, Georgia 31401
Telephone: (912) 236-9559
Facsimile: (912) 236-1884
Cell Phone: (912) 695-4491
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E-mail: kim@fairfightinitiative.org

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From: CARLTON E. JOYCE <CEJOYCE@bouhan.com>
Sent: Thursday, April 14, 2022 12:00 PM
To: David Utter <david@claibornefirm.com>; Lighthiser, Mary Ellen <mlighthiser@SWFLLP.com>; Andre Pretorius <anpretorius@chathamcounty.org>; jon@hartlawsav.com
Cc: Will Claiborne <will@claibornefirm.com>; Lucas D. Bradley <LDBradley@bouhan.com>; Kim Griffin <Kim@claibornefirm.com>; Christy, John <jchristy@SWFLLP.com>; Flint, Michael <mflint@SWFLLP.com>
Subject: RE: Hodges v. Chatham County

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

JESSICA HODGES, As natural guardian of)
minor children, L.C. and D.C.; and)
ESTATE OF LEE MICHAEL CREELY,)
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CHATHAM COUNTY, GEORGIA;)
CORRECTHEALTH CHATHAM LLC;)
CORRECTHEALTH, LLC;)
CARLO MUSSO, M.D.;)
KAREN FORCHETTE; ALFRED)
NEVELS; SELENA CARDONA;)
TEANNA FRANCES-HENDERSON;)
TERENCE JACKSON; DON WHITE;)
KARLOS MANNING;)
YVETTE BETHEL-QUINNEY;)
LOWRETTA FLORENCE; AMBER)
ANDERSON; JACKIE HARNED; SUSAN)
RIVERA; and LOUIKISHA ROBERTS;)

Defendants.)

PLAINTIFFS' INITIAL DISCLOSURES

Pursuant to Federal Rules of Civil Procedure 26(a)(1) Plaintiffs Jessica Hodges, as natural guardian of minor children, L.C. and D.C., and Estate of Lee Michael Creely, by and through Warren Ratchford, its Administrator, make the following Initial Disclosures:

A. Rule 26 (a) (1) (A) (i) - Individuals likely to have discoverable information:

The following are the names of each individual likely to have discoverable information that the Plaintiffs may use to support their claims or defenses, unless the use would be solely for impeachment:

1	Jessica Hodges Plaintiff	Can be contacted through her attorney's office. William R. Claiborne David J. Utter The Claiborne Firm, P.C. 410 East Bay Street Savannah, Georgia 31401 (912) 236-9559	She is likely to have information and/or knowledge surrounding Lee Michael Creely's later life and Plaintiff's damages.
2	John Wilcher Sheriff Chatham County	Chatham County Sheriff's Office 1050 Carl Griffin Drive Savannah, Georgia 31405 (912) 652-7600	He is likely to have information and/or knowledge regarding the circumstances surrounding Lee Michael Creely's arrest, detention, and death at the Chatham County Jail, and the Jail's policies and procedures.
3	Don White Defendant	Can be contacted through his attorney's office. Jonathan Hart Andre Pretorius Chatham County Attorney Office 24 Bull Street Room 230 Savannah, Georgia 31401 (912) 652-7881	He is likely to have information and/or knowledge regarding the circumstances surrounding Lee Michael Creely's arrest, detention, and death at the Chatham County Jail, and the Jail's policies and procedures.
4	Alfred Nevels Defendant	Can be contacted through his attorney's office. Jonathan Hart Andre Pretorius Chatham County Attorney Office 24 Bull Street Room 230 Savannah, Georgia 31401 (912) 652-7881	He is likely to have information and/or knowledge regarding the circumstances surrounding Lee Michael Creely's arrest, detention, and death at the Chatham County Jail, and the Jail's policies and procedures.
5	Selena Cardona Defendant	Can be contacted through her attorney's office. Jonathan Hart Andre Pretorius Chatham County Attorney Office 24 Bull Street Room 230 Savannah, Georgia 31401 (912) 652-7881	She is likely to have information and/or knowledge regarding the circumstances surrounding Lee Michael Creely's arrest, detention, and death at the Chatham County Jail, and the Jail's policies and procedures.
6	Teanna Frances-Henderson Defendant	Can be contacted through her attorney's office. Jonathan Hart Andre Pretorius	She is likely to have information and/or knowledge regarding the circumstances surrounding Lee Michael

		Chatham County Attorney Office 24 Bull Street Room 230 Savannah, Georgia 31401 (912) 652-7881	Creely's arrest, detention, and death at the Chatham County Jail, and the Jail's policies and procedures.
7	Terence Jackson Defendant	Can be contacted through his attorney's office. Jonathan Hart Andre Pretorius Chatham County Attorney Office 24 Bull Street Room 230 Savannah, Georgia 31401 (912) 652-7881	He is likely to have information and/or knowledge regarding the circumstances surrounding Lee Michael Creely's arrest, detention, and death at the Chatham County Jail, and the Jail's policies and procedures.
8	Karlos Manning Defendant	Can be contacted through his attorney's office. Jonathan Hart Andre Pretorius Chatham County Attorney Office 24 Bull Street Room 230 Savannah, Georgia 31401 (912) 652-7881	He is likely to have information and/or knowledge regarding the circumstances surrounding Lee Michael Creely's arrest, detention, and death at the Chatham County Jail, and the Jail's policies and procedures.
9	Yvette Bethel-Quinney Defendant	Can be contacted through her attorney's office. Jonathan Hart Andre Pretorius Chatham County Attorney Office 24 Bull Street Room 230 Savannah, Georgia 31401 (912) 652-7881	She is likely to have information and/or knowledge regarding the circumstances surrounding Lee Michael Creely's arrest, detention, and death at the Chatham County Jail, and the Jail's policies and procedures.
10	Chatham County, Georgia Defendant	Can be contacted through its attorney's office. Jonathan Hart Andre Pretorius Chatham County Attorney Office 24 Bull Street Room 230 Savannah, Georgia 31401 (912) 652-7881	Has information and/or knowledge regarding the County's responsibility for funding operations and staffing, including for health care at the jail, including but not limited to provide physical and mental health care, screening, assessment, treatment, and attention to those individuals detained at the Jail, including the circumstances surrounding Lee Michael Creely's detention at the Jail, the health care

			provided to him, and the Jail's health care policies and procedures.
11	Representatives and/or employees of Chatham County Sheriff's Office and Chatham County Jail	Chatham County Sheriff's Office 1050 Carl Griffin Drive Savannah, Georgia 31405 (912) 652-7600	Representatives and/or employees of Chatham County Sheriff's Office and Chatham County Detention Center who had contact with Michael Lee Creely, have information and/or knowledge surrounding the circumstances surrounding the arrest, detention, and death at the Chatham County Jail, and the Jail's policies and procedures.
12	CorrectHealth LLC Defendant	Can be contacted through its attorney's office. Carlton Joyce Bouhan Falligant LLP One West Park Avenue Savannah, Georgia 31401 (912) 644-5754	Has information and/or knowledge regarding the circumstances surrounding Lee Michael Creely's medical treatment at the Chatham County Jail, CorrectHealth's policies and procedures, as well as its contract with Chatham County.
13	CorrectHealth Chatham LLC Defendant	Can be contacted through its attorney's office. Carlton Joyce Bouhan Falligant LLP One West Park Avenue Savannah, Georgia 31401 (912) 644-5754	Has information and/or knowledge regarding the circumstances surrounding Lee Michael Creely's medical treatment at the Chatham County Jail, CorrectHealth Chatham's policies and procedures, as well as its contract with Chatham County.
14	Carlo Musso, M.D. Defendant	Can be contacted through his attorney's office. Carlton Joyce Bouhan Falligant LLP One West Park Avenue Savannah, Georgia 31401 (912) 644-5754	He has information and/or knowledge regarding the circumstances surrounding Lee Michael Creely's medical treatment at the Chatham County Jail, supervision, administration, policies, practices, customs, operations, training of staff, the provision of health care at the Jail, and his contract with Chatham County.
15	Karen Forchette Defendant	Can be contacted through her attorney's office.	She has information and/or knowledge regarding the

		Carlton Joyce Bouhan Falligant LLP One West Park Avenue Savannah, Georgia 31401 (912) 644-5754	circumstances surrounding Lee Michael Creely's medical treatment at the Chatham County Jail, supervision, administration, policies, practices, customs, operations, training of staff, and provision of health care at the Jail.
16	Amber Anderson Defendant	Can be contacted through her attorney's office. Carlton Joyce Bouhan Falligant LLP One West Park Avenue Savannah, Georgia 31401 (912) 644-5754	She has information and/or knowledge regarding the circumstances surrounding Lee Michael Creely's medical treatment at the Chatham County Jail.
17	Jackie Harned Defendant	Can be contacted through her attorney's office. Carlton Joyce Bouhan Falligant LLP One West Park Avenue Savannah, Georgia 31401 (912) 644-5754	She has information and/or knowledge regarding the circumstances surrounding Lee Michael Creely's medical treatment at the Chatham County Jail.
18	Lowretta Florence Defendant	Can be contacted through her attorney's office. Carlton Joyce Bouhan Falligant LLP One West Park Avenue Savannah, Georgia 31401 (912) 644-5754	She has information and/or knowledge regarding the circumstances surrounding Lee Michael Creely's medical treatment at the Chatham County Jail.
19	Loukisha Roberts Defendant	Can be contacted through her attorney's office. Mary Ellen A. Lighthiser Schreeder, Wheeler & Flint, LLP 1100 Peachtree St. NE, Suite 800 Atlanta, GA 30309 (404) 954-9870	She has information and/or knowledge regarding the circumstances surrounding Lee Michael Creely's medical treatment at the Chatham County Jail.
20	Representatives and/or employees of CorrectHealth LLC	Chatham County Sheriff's Office 1050 Carl Griffin Drive Savannah, Georgia 31405 (912) 652-7600	Representatives and/or employees of CorrectHealth LLC who had contact with Lee Michael Creely, have information and/or knowledge surrounding the circumstances surrounding the arrest, detention, and death at the Chatham County Jail, the medical treatment provided to

			him, and CorrectHealth LLC's policies and procedures.
21	Representatives and/or employees of CorrectHealth Chatham LLC	Chatham County Sheriff's Office 1050 Carl Griffin Drive Savannah, Georgia 31405 (912) 652-7600	Representatives and/or employees of CorrectHealth Chatham LLC who had contact with Lee Michael Creely, have information and/or knowledge surrounding the circumstances surrounding the arrest, detention, and death at the Chatham County Jail, the medical treatment provided to him, and CorrectHealth Chatham LLC's policies and procedures.
22	Lt. Tanya Jacques Internal Affairs Unit Chatham County Sheriff's Office	Chatham County Sheriff's Office 1050 Carl Griffin Drive Savannah, Georgia 31405 (912) 652-7600	She is likely to have information and/or knowledge regarding the circumstances surrounding Lee Michael Creely's arrest, detention, and death at the Chatham County Jail, and the Jail's policies and procedures.
23	Billy Freeman Chief Deputy Chatham County Sheriff's Office	Chatham County Sheriff's Office 1050 Carl Griffin Drive Savannah, Georgia 31405 (912) 652-7600	He is likely to have information and/or knowledge regarding the circumstances surrounding Lee Michael Creely's arrest, detention, and death at the Chatham County Jail, and the Jail's policies and procedures.
24	Gary Morin Chatham County Sheriff's Office	Chatham County Sheriff's Office 1050 Carl Griffin Drive Savannah, Georgia 31405 (912) 652-7600 4 Sheridan Circle Savannah, Georgia 31406 (810) 357-8555	He is likely to have information and/or knowledge regarding the circumstances surrounding Lee Michael Creely's arrest, detention, and death at the Chatham County Jail, and the Jail's policies and procedures.
25	Erick Griffith Chatham County Sheriff's Office	Chatham County Sheriff's Office 1050 Carl Griffin Drive Savannah, Georgia 31405 (912) 652-7600	He is likely to have information and/or knowledge regarding the circumstances surrounding Lee Michael Creely's arrest, detention, and death at the Chatham County Jail, and the Jail's policies and procedures.

26	Justin Frye Chatham County Sheriff's Office	Chatham County Sheriff's Office 1050 Carl Griffin Drive Savannah, Georgia 31405 (912) 652-7600 515 Pennsylvania Avenue #132 Savannah, Georgia 31404 (912) 604-5517	He is likely to have information and/or knowledge regarding the circumstances surrounding Lee Michael Creely's arrest, detention, and death at the Chatham County Jail, and the Jail's policies and procedures.
27	Jacob Ganas Chatham County Sheriff's Office	Chatham County Sheriff's Office 1050 Carl Griffin Drive Savannah, Georgia 31405 (912) 652-7600 108 Windmill Lane Savannah, Georgia (724) 557-8750	He is likely to have information and/or knowledge regarding the circumstances surrounding Lee Michael Creely's arrest, detention, and death at the Chatham County Jail, and the Jail's policies and procedures.
28	Lavishia Little Holt Chatham County Sheriff's Office	Chatham County Sheriff's Office 1050 Carl Griffin Drive Savannah, Georgia 31405 (912) 652-7600 33 Springwater Drive Savannah, Georgia (912) 342-9471 (912) 349-6030	She is likely to have information and/or knowledge regarding the circumstances surrounding Lee Michael Creely's arrest, detention, and death at the Chatham County Jail, and the Jail's policies and procedures.
29	Devon Gardner Chatham County Sheriff's Office	Chatham County Sheriff's Office 1050 Carl Griffin Drive Savannah, Georgia 31405 (912) 652-7600 126 Jamestown Drive Rincon, Georgia 31326 (240) 491-1287	He is likely to have information and/or knowledge regarding the circumstances surrounding Lee Michael Creely's arrest, detention, and death at the Chatham County Jail, and the Jail's policies and procedures.
30	Corporal Sutton Effingham County Sheriff's Office	Effingham County Sheriff's Office 130 East 1 st Street Springfield, Georgia 31329 (912) 754-3449	He is likely to have information and/or knowledge regarding the circumstances surrounding Lee Michael Creely's arrest and detention at the Effingham County Sheriff Office.
31	Sgt. Morrison Effingham County Sheriff's Office	Effingham County Sheriff's Office 130 East 1 st Street Springfield, Georgia 31329 (912) 754-3449	He is likely to have information and/or knowledge regarding the circumstances surrounding Lee Michael Creely's arrest and detention at the Effingham County Sheriff Office.

32	Captain Broome Chatham County Sheriff's Office	Chatham County Sheriff's Office 1050 Carl Griffin Drive Savannah, Georgia 31405 (912) 652-7600	He is likely to have information and/or knowledge regarding the circumstances surrounding Lee Michael Creely's arrest, detention, and death at the Chatham County Jail, and the Jail's policies and procedures.
33	Representatives and/or employees of Chatham County Medical Examiner and Coroner's Office	Chatham County Medical Examiner and Coroner's Office 602 East 67 th Street Savannah, Georgia 31405	Representatives and/or employees of Chatham County Medical Examiner and Coroner's Office is likely to have information and/or knowledge regarding the circumstances surrounding Lee Michael Creely's death at the Chatham County Jail.
34	Dr. Kenneth A. Ray, DBH Med	Unknown at this time.	He is likely to have information and/or knowledge regarding the circumstances surrounding Lee Michael Creely's death at the Chatham County Jail.
35	Dr. Ronald M. Shansky, MD, MPH	John H Scroger Hospital 1901 W Harrison St, Chicago, IL 60612 (312) 864-6000	He is likely to have information and/or knowledge regarding the circumstances surrounding Lee Michael Creely's death at the Chatham County Jail.
36	Edmund Donoghue Regional Medical Examiner GBI	Georgia Bureau of Investigation (912) 921-5900	He is likely to have information and/or knowledge regarding the circumstances surrounding Lee Michael Creely's death at the Chatham County Jail.
37	Natalie Hipps Forensic Toxicologist GBI	Georgia Bureau of Investigation (404) 270-8249	She is likely to have information and/or knowledge regarding the circumstances surrounding Lee Michael Creely's death at the Chatham County Jail.
38	Sergeant Mark Stanfield Internal Affairs Chatham County Sheriff's Office	Chatham County Sheriff's Office 1050 Carl Griffin Drive Savannah, Georgia 31405 (912) 652-7600	He is likely to have information and/or knowledge regarding the circumstances surrounding Lee Michael Creely's arrest, detention, and death at the Chatham County Jail, and the Jail's policies and procedures.
39	Officer K. Williams	Chatham County Sheriff's Office 1050 Carl Griffin Drive	She is likely to have information and/or knowledge

	Chatham County Sheriff's Office	Savannah, Georgia 31405 (912) 652-7600	regarding the circumstances surrounding Lee Michael Creely's arrest, detention, and death at the Chatham County Jail, and the Jail's policies and procedures.
40	Terry Bell (RN) CorrectHealth LLC CorrectHealth Chatham LLC	Chatham County Sheriff's Office 1050 Carl Griffin Drive Savannah, Georgia 31405 (912) 652-7600	Has information and/or knowledge regarding the circumstances surrounding Lee Michael Creely's, medical treatment at the Chatham County Jail.
41	Officer Bacon Chatham County Sheriff's Office	Chatham County Sheriff's Office 1050 Carl Griffin Drive Savannah, Georgia 31405 (912) 652-7600	He is likely to have information and/or knowledge regarding the circumstances surrounding Lee Michael Creely's arrest, detention, and death at the Chatham County Jail, and the Jail's policies and procedures.
42	Officer Lacey Chatham County Sheriff's Office	Chatham County Sheriff's Office 1050 Carl Griffin Drive Savannah, Georgia 31405 (912) 652-7600	She is likely to have information and/or knowledge regarding the circumstances surrounding Lee Michael Creely's arrest, detention, and death at the Chatham County Jail, and the Jail's policies and procedures.
43	Cpl. G. Anderson Chatham County Sheriff's Office	Chatham County Sheriff's Office 1050 Carl Griffin Drive Savannah, Georgia 31405 (912) 652-7600	He is likely to have information and/or knowledge regarding the circumstances surrounding Lee Michael Creely's arrest, detention, and death at the Chatham County Jail, and the Jail's policies and procedures.
44	Sgt. Young Chatham County Sheriff's Office	Chatham County Sheriff's Office 1050 Carl Griffin Drive Savannah, Georgia 31405 (912) 652-7600	He is likely to have information and/or knowledge regarding the circumstances surrounding Lee Michael Creely's arrest, detention, and death at the Chatham County Jail, and the Jail's policies and procedures.
45	Sgt. F. Williams Chatham County Sheriff's Office	Chatham County Sheriff's Office 1050 Carl Griffin Drive Savannah, Georgia 31405 (912) 652-7600	He is likely to have information and/or knowledge regarding the circumstances surrounding Lee Michael Creely's arrest, detention, and death at the

			Chatham County Jail, and the Jail's policies and procedures.
46	Melissa Aschenbreener EMT	Chatham County EMS 1399 Dean Forest Road Savannah, Georgia 31405 (912) 354-1011	She is likely to have information and/or knowledge regarding the circumstances surrounding Lee Michael Creely's death at the Chatham County Jail.
47	Nurse Sigman (RN) CorrectHealth LLC CorrectHealth Chatham LLC	Chatham County Sheriff's Office 1050 Carl Griffin Drive Savannah, Georgia 31405 (912) 652-7600	Has information and/or knowledge regarding the circumstances surrounding Lee Michael Creely's, medical treatment at the Chatham County Jail.
48	Deputy Warfield Chatham County Sheriff's Office	Chatham County Sheriff's Office 1050 Carl Griffin Drive Savannah, Georgia 31405 (912) 652-7600	He is likely to have information and/or knowledge regarding the circumstances surrounding Lee Michael Creely's arrest, detention, and death at the Chatham County Jail, and the Jail's policies and procedures.
49	Trevin Goodman	Georgia Bureau of Investigation (404) 270-8249	He is likely to have information and/or knowledge regarding the circumstances surrounding Lee Michael Creely's death at the Chatham County Jail.
50	Terri Hodges (Mother to Jessica Hodges)	Can be contacted through William R. Claiborne David J. Utter The Claiborne Firm, P.C. 410 East Bay Street Savannah, Georgia 31401 (912) 236-9559	She is likely to have information and/or knowledge surrounding Lee Michael Creely's later life and Plaintiff's damages.
51	Joan Creely Carter (Mother to Lee Michael Creely)	Can be contacted through William R. Claiborne David J. Utter The Claiborne Firm, P.C. 410 East Bay Street Savannah, Georgia 31401 (912) 236-9559	She is likely to have information and/or knowledge surrounding Lee Michael Creely's life and Plaintiff's damages.
52	Michael Todd Creely (Father to Lee Michael Creely)	Can be contacted through William R. Claiborne David J. Utter The Claiborne Firm, P.C. 410 East Bay Street Savannah, Georgia 31401	He is likely to have information and/or knowledge surrounding Lee Michael Creely's life and Plaintiff's damages.

	(912) 236-9559
53	Any person, including fact or expert witnesses, identified in discovery conducted in this action.
54	Any and all witnesses listed by any other party.

This list will be supplemented pending the receipt of additional information regarding this case.

B. Rule 26 (a) (1) (A) (ii) – Documents, electronically stored information, and tangible things in Plaintiffs possession that they may use to support their claims or defenses

The following documents are in the possession, custody or control of the Plaintiffs and may be used to support their claims or defenses, unless the use would solely be for impeachment:

Bates Number CLF	Document
000001-000089	Creely_Lee_emails_thru_Sep_11_2020
000090-000459	20210419-Creely-Documents from DOA
000460-000462	Creely_Lee_Phoenix
000463-000480	Creely Death Chart Review Submitted 020821 highlighted
000481-000483	Crdata
000484-000572	IA report with additional findings
000573	Ofc. T. Jackson- Video
000574	Quinney- Video
000575	Rivera- Video
000576	Roberts- Video
000577	White, Don(1) – Video
000578	White, Don(2) – Video
000579	1# CM0778 Unit 2B-Video
000580	Census- Audio
000581-000669	Creely_Lee_emails_thru_Sep_11_2020
000670	Census- Audio (note same as bates# 00580) Duplicate
000671	1# CM0778 Unit 2B Dayarea@2020-09-06T235525.107Z (000671)-duplicate (same as bates #000579)
000672	1# CM0779 Unit 2 B Desk Day Area@2020-09-07T022124.078Z
000673	2B Creely Lee Code Black Sep 6 2020
000674-	IA report Lee Creely

000709	
000710	I-M Creely_I-M Burns with Ofc. Quinney-Audio
000711	P15_5033_125_20200903121924-calls-Audio
000712- 000790	Inmate Incident Reports
000791- 000840	Interviews
000841- 000861	Photographs
000862- 000990	Policies-log books-inmate information
000991	Off. D. White 9-7-20 Axon Body Cam 3- Video
000992	Ofc. T. Jackson-duplicate-Video (note- same as bates# 000573)
000993	Quinney- duplicate- Video (note- same as bates#000574)
000994	Roberts- duplicate- Video (note- same as bates#000576)
000995	Rivera-duplicate- Video (note- same as bates#000575)
000996	White, Don(1)- duplicate- Video (note- same as bates# 000577)
000997	White, Don(2)- duplicate- Video (note- same as bates# 000578)
000998	Frye- video interview- Video
000999	Griffith- video interview- Video
001000	Lt. Nevels- video interview- Video
001001	Manning- video interview- Video
001002	Morin- video interview- Video
001003	Ofc. Cardona- video interview- Video
001004	Ofc. Henderson- video interview- Video
001005- 001093	Creely emails through 9-11-20

001094-001111	Creely Death Chart Review Submitted 020821 highlighted- duplicate (Note : see bates #000463-000480)
001112-001114	Creely_Lee_Phoenix-duplicate- (Note : See bates# 000460-000462)
001115	Index Log book records
001116-001120	Summary of statements re Lee Michael Creely
001121-001122	June 9, 2021 Letter to Claiborne Firm Regarding Sheriff OR Response
001123-001213	RFP – Inmate Healthcare Services – 17-0109-1
001214-001221	COCHS Chatham County Detention Center Report 1
001222-001230	COCHS Chatham County Detention Center Report 2
001231-001240	COCHS Chatham County Detention Center Report 3
001241-001251	COCHS Chatham County Detention Center Report 4
001252-001254	COCHS Chatham County Detention Center Report 5
001255-001258	COCHS Chatham County Detention Center Report 6
001259-001266	COCHS Chatham County Detention Center Report 7
001267-001275	COCHS Chatham County Detention Center Report 8
001276-001286	COCHS Chatham County Detention Center Report 9
001287-001296	COCHS Chatham County Detention Center Report 10
001297-001304	COCHS Chatham County Detention Center Report 11
001305-001342	Contract CorrectHealth Final 09-01-16 from Google Search
001343-001367	20180701 CH Contract
	CH Employee File- CH FLORENCE 001-062
	CH Employee File- CH FORCHETTE 001-073
	CH Employee File- CH RIVERA 001-044
	CH Medical Records Lee Michael Creely- CH 001-105, 2
001368	Creely-Death Certificate
	Any document listed by any other party.

This list will be supplemented pending the receipt of additional information regarding this case.

C. Computation of Damages

Compensatory and punitive damages for constitutional violations, all costs of these proceedings and legal interest, and punitive damages pursuant to 42 U.S.C. § 1983, and reasonable attorneys' fees, as provided in 42 U.S.C. § 1988, and any other damages flowing from applicable statutes for all Defendants and for wrongful death under state law, and all other relief as appears just and proper to the Court.

D. Insuring Agreement

Not applicable.

Respectfully submitted, this 28th day of April, 2022.

THE CLAIBORNE FIRM, P.C.

/s/ David J. Utter

DAVID J. UTTER

Georgia Bar No.: 723144

WILLIAM R. CLAIBORNE

Georgia Bar No.: 126363

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(912) 236-1884 Facsimile

ATTORNEYS FOR PLAINTFFS

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served on all counsel of record electronically.

This 28th day of April, 2022.

/s/ David Utter
DAVID J. UTTER